

2 pages

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Attorney for Debtor(s)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA

In re

Case No. 2011-33250

WINFORD SAMPLE

DCN: BB-1

and

Date: July 26, 2011

WILMA SAMPLE

Time: 9:30

Judge: Hon. Christopher M. Klein  
Crtrm: 35

Debtors

MOTION FOR ORDER TO  
COMPEL TRUSTEE TO  
ABANDON BUSINESS ASSETS

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WINFORD SAMPLE and WILMA SAMPLE, the debtors herein, move this court for an order compelling the Trustee, JOHN REGER, to abandon their DOUBLE W TRAINING located at 6950 Hyrax Road, Anderson, California, Shasta County. This is a small business for boarding horses. They have few horses that they are boarding at this time. Trustee has evaluated their petition. Trustee's stipulation to abandon the business properties has been filed with the court and is attached hereto as **Exhibit "A"**.

The debtors have utilized their joint tools of the trade exemption in exempting the business assets.

1 Filed Schedules B and C are attached as **[Exhibit B]** identifying the businesses assets and  
2 inventory and the exemptions claimed on the property. Trustee has stipulated to the  
3 abandonment of the business.

4 The debtor , therefore, request that the Trustee be directed to abandon the bankruptcy  
5 estate's interest in the debtors' businesses referenced above, and for such other relief as may be  
6 appropriate.

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8 Dated: June 21, 2011

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10 /s/ Bonnie Baker  
11 BONNIE BAKER,  
12 Attorney for Debtors  
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